

Exhibit 6

1 **CHRISTENSEN JAMES & MARTIN**
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10 *Union, Luisa Blue, and Martin Manteca*

11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 JAVIER CABRERA, an individual;
14 DEBORAH MILLER, an individual,
15 CHERIE MANCINI, an individual;
16 NEVADA SERVICE EMPLOYEES
17 UNION STAFF UNION (“NSEUSU”),
18 an unincorporated association,

19 Plaintiffs,

20 vs.

21 SERVICE EMPLOYEES
22 INTERNATIONAL UNION, a nonprofit
23 cooperative corporation; LUISA BLUE,
24 in her official capacity as Trustee of
25 Local 1107; MARTIN MANTECA, in
26 his official capacity as Deputy Trustee of
27 Local 1107; MARY K. HENRY, in her
official capacity as Union President;
CLARK COUNTY PUBLIC
EMPLOYEES ASSOCIATION dba
NEVADA SERVICE EMPLOYEES
UNION aka SEIU LOCAL 1107, a
nonprofit cooperative corporation;
CAROL NIETERS, an individual; DOES
1-20; and ROE CORPORATIONS 1-20,
inclusive,

Defendants.

Case No.: 2:18-cv-00304-RFB-DJA

**LOCAL 1107, MANTECA AND
BLUE’S EXPERT WITNESSES
DISCLOSURES**

1 Luisa Blue, Martin Manteca and Nevada Service Employees Union
2 (misnamed Clark County Public Employees Association aka SEIU Local 1107)
3 (collectively “Local 1107 Defendants”) hereby make the following disclosures
4 pursuant to FRCP 26(a)(2).

5 EXPERT WITNESSES

- 6 1. Kirk Marangi, M.B.A.
7 2. Edward L. Bennett, M.A., C.R.C., C.D.M.S.

8 DOCUMENTS

- 9 1. Report by Kirk Marangi with accompanying tables and attachments, Bates
10 stamped for reference as “Marangi – 001” through “Marangi – 018”.

11 Tables

- 12 A. Table 1, Rebuttal Report;
13 B. Table 2, Source of Information;
14 C. Table 3, Kirkendall Exhibit C-1 with Rebuttal Assumptions;
15 D. Table 4, Kirkendall Exhibit C-2 with Rebuttal Assumptions;
16 E. Table 5, Kirkendall Exhibit D with Rebuttal Assumptions;
17 F. Attachment I, CV;
18 G. Attachment II, List of Expert Testimony;
19 H. Attachment III, Fee Schedule.
20 2. Report by Edward L. Bennett with accompanying exhibits, Bates stamped for
21 reference as “Bennett – 001” through “Bennett – 083”.

22 Exhibits

- 23 A. List of Records Reviewed;
24 B. List of Labor Unions in Nevada;
25 C. List of Labor Unions in Las Vegas/Henderson, NV;
26 D. Curriculum Vitae;
27 E. Fee Schedule;

1 F. List of Expert Testimony.

2 DATED this 10th day of October 2019.

3 CHRISTENSEN JAMES & MARTIN

4 By: /s/ Evan L. James

5 Evan L. James, Esq.

6 Nevada Bar No. 7760

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11 *Attorneys for Defendant Nevada*

12 *Service Employees Union, Luisa Blue,*

13 *and Martin Manteca*

CERTIFICATE OF SERVICE

I am an employee of Christensen James & Martin and caused a true and correct copy of the foregoing document to be served in the following manner on October 10, 2019

— ELECTRONIC SERVICE: Through the Court's E-Filing System to the following:

✓ VIA UNITED STATES MAIL:

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CHRISTENSEN JAMES & MARTIN

By: /s/ Natalie Saville
Natalie Saville